

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the Matter of

**Telecommunications Carriers Eligible
For Universal Service Support**

WC Docket No. 09-197

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**REQUEST FOR RELINQUISHMENT OF ELIGIBLE TELECOMMUNICATIONS CARRIER
DESIGNATION**

Shenandoah Personal Communications, LLC (“Shentel”) pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a)-(b), hereby requests that the Federal Communications Commission (the “Commission”) grant the relinquishment of the eligible telecommunications carrier (“ETC”) designation of certain of its predecessors-in-interest, Virginia PCS Alliance, L.C. and Richmond 20 MHZ, LLC, in the Commonwealth of Virginia (Study Area Code 199008). In support of its request for relinquishment, Shentel provides the following information.

By Order dated June 23, 2005, the Commission designated Virginia PCS Alliance, L.C. and Richmond 20 MHZ, LLC (together, d/b/a “NTELOS”) as an ETC in the Commonwealth of Virginia.¹ Thereafter, NTELOS operated as a facilities-based provider of wireless services and participated in the Commission’s High Cost and Low Income Universal Service programs. NTELOS and its affiliates were acquired by Shenandoah Telecommunications Company, the parent company of Shentel, in a transaction approved by the Commission by order dated April 15, 2016.² The acquisition was consummated on May 6, 2016. Subsequently, as part of a larger legal entity restructuring following the merger, NTELOS was merged into Shentel, such that Shentel remains as the surviving entity. Although certain affiliates of

¹ *In the Matter of Fed.-State Joint Board on Universal Service, Virginia PCS Alliance, L.C. & Richmond 20 MHz LLC D/B/A NTELOS Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, Order, 20 F.C.C. Rcd. 11016, 11016 (2005).

² *In the Matter of Sprintcom, Inc., Shenandoah Personal Communications LLC, & Ntelos Holdings Corp.*, Memorandum Opinion and Order, 31 F.C.C. Rcd. 3631 (2016).

Shentel are designated as ETCs in Virginia,³ Shentel itself is not designated as an ETC in the Commonwealth of Virginia.

Section 214(e)(4) of the Communications Act, as amended, requires the Commission to permit Commission-designated ETCs to relinquish their designation in any area served by more than one ETC.⁴ In Attachment A, Shentel provides a list by wire center of ILEC ETCs providing service in NTELOS's former ETC service area.⁵ In addition, Shentel will continue to manage the former NTELOS wireless network through its affiliate relationship with Sprint; as such, Sprint will continue to provide service through NTELOS's previous ETC service area, but will do so as a non-ETC.

NTELOS served fewer than 20 Lifeline customers in its ETC service area as of the time the merger was complete. Consistent with its responses to the Commission's requests for information,⁶ Lifeline customers were provided advance notice to migrate to Sprint's Assurance prepaid service prior to the termination of NTELOS's prepaid billing platform in October 2016. The Assurance prepaid service continues to be offered throughout the former NTELOS service area.

For the foregoing reasons, Shentel requests that the Commission promptly accept the relinquishment of NTELOS's ETC designation (SAC 199008) in Virginia as soon as practicable.

³ The ETC designation is held by Shenandoah Telephone Company, a wholly-owned subsidiary of Shenandoah Telecommunications Company, which shares the same management, technical and financial qualifications as Shentel.

⁴ 47 U.S.C. § 214(e)(4).

⁵ NTELOS previously petitioned the Commission for reduction in the size of its study area. *See* In the Matter of Telecommunications Carriers Eligible for Universal Service Support Connect America Fund NTELOS Petition for Modification of Eligible Telecommunications Carrier Service Area, WC Docket Nos. 09-197, 10-90 Filed October 1, 2010 (the "Service Area Reduction Petition"). Due to the fact that the Commission has not issued an order on the Service Area Reduction Petition, Shentel requests that the Commission consolidate the Service Area Reduction Petition with this petition and relinquish ETC designation for all areas making up SAC 199008.

⁶ Shenandoah Personal Communications, LLC Response to Requests for Information Filed December 4, 2016, WT Docket No. 15-262 (posted Dec. 7, 2016).

Respectfully submitted,

/s/ K.C. Halm

K.C. Halm

Christopher A. Cook

DAVIS WRIGHT TREMAINE LLP

1919 Pennsylvania Ave., NW

Suite 800

Washington, D.C. 20006

*Counsel to Shenandoah Personal
Communications, LLC*

June 29, 2017

ATTACHMENT A

ILEC Name	Wire Center	Wire Center Name
Verizon South (Contel)	AMHRVAXA	Amherst
Verizon South (Contel)	APMTVAXA	Appomattox
Verizon South (Contel)	BRWRVAXA	Bridgewater
Verizon South (Contel)	BRWYVAXA	Broadway
Verizon South (Contel)	CHKTVAXA	Chuckatuck
Verizon South (Contel)	CRTDVAXA	Crittenden
Verizon South (Contel)	DSPAVAXA	Disputanta
Verizon South (Contel)	DSWLVAXA	Doswell
Verizon South (Contel)	DYTNVAXA	Dayton
Verizon South (Contel)	EDOMVAXA	Edom
Verizon South (Contel)	EKTNVAXA	Elkton
Verizon South (Contel)	FKLNVAXB	Franklin
Verizon South (Contel)	GLCSVAXA	Gloucester
Verizon South (Contel)	GRBRVAXA	Great Bridge
Verizon South (Contel)	GRBRVAXB	Great Bridge- Battlefield
Verizon South (Contel)	GRTSVAXA	Grottoes
Verizon South (Contel)	HAYSVAXA	Hayes
Verizon South (Contel)	HCKRVAXA	Hickory
Verizon South (Contel)	HLLDVAXA	Holland
Verizon South (Contel)	HRBGVAXA	Harrisonburg
Verizon South (Contel)	IVORVAXA	Ivor
Verizon South (Contel)	KZTWVAXA	Keezletown
Verizon South (Contel)	LDYSVAXA	Ladysmith
Verizon South (Contel)	MGVLVAXA	Mcgaheysville
Verizon South (Contel)	PRANVAXA	Princess Anne
Verizon South (Contel)	PRANVAXB	Princess Anne- Shipps Corner
Verizon South (Contel)	PUNGVAXA	Pungo
Verizon South (Contel)	RPHNVAXA	Raphine
Verizon South (Contel)	SMFDVAXA	Smithfield
Verizon South (Contel)	STCKVAXA	Stony Creek
Verizon South (Contel)	WKFDVAXA	Wakefield
Verizon South (Contel)	WNDSVAXA	Windsor
Verizon South (Contel)	WYCVVAXA	Weyers Cave
Verizon Virginia	ASLDVAAS	Ashland
Verizon Virginia	BCHNVABH	Buchanan
Verizon Virginia	BDFRVABD	Bedford
Verizon Virginia	BEVLVABV	Berryville
Verizon Virginia	BLBGVABB	Blacksburg
Verizon Virginia	CHESVACR	Chester

Verizon Virginia	CHHMOVACH	Chatham
Verizon Virginia	CHSKVACD	Chesapeake- Churchland
Verizon Virginia	CHSKVADC	Chesapeake- Deep Creek
Verizon Virginia	CHSKVAGU	Chesapeake- Guerriere
Verizon Virginia	CLHGVACO	Colonial Heights
Verizon Virginia	CRBGVACB	Christiansburg
Verizon Virginia	DAVLVADA	Danville
Verizon Virginia	DAVLVAFP	Danville- Franklin Pike
Verizon Virginia	DAVLVAWE	Danville- Westover
Verizon Virginia	DBLNVADU	Dublin
Verizon Virginia	DRVRVADR	Suffolk- Driver
Verizon Virginia	FRBGVAFB	Fredericksburg
Verizon Virginia	FRBGVALH	Fredericksburg- Lee Hill
Verizon Virginia	GNWDVAGW	Greenwood
Verizon Virginia	HMPNVAAAB	Hampton- Aberdeen
Verizon Virginia	HMPNVADC	Hampton- Drummonds Corner
Verizon Virginia	HMPNVAQN	Hampton- Queen St
Verizon Virginia	HMPNVAWD	Hampton- Woodland
Verizon Virginia	HPWLVAHW	Hopewell
Verizon Virginia	LVTNVALN	Lovingston
Verizon Virginia	LYBGVACH	Lynchburg- Church St
Verizon Virginia	LYBGVACV	Lynchburg- Clearview
Verizon Virginia	LYBGVAMH	Lynchburg- Madison Heights
Verizon Virginia	LYBGVANL	Lynchburg- New London Rd
Verizon Virginia	LYBGVAOF	Lynchburg- Old Forest Rd
Verizon Virginia	LYBGVATM	Lynchburg- Timberlake
Verizon Virginia	LYBGVAYB	Lynchburg- Yellow Branch
Verizon Virginia	MCHVVAMV	Mechanicsville
Verizon Virginia	MDLTVAMD	Midlothian
Verizon Virginia	MDSNVAMA	Madison
Verizon Virginia	MNKNVAMN	Manakin
Verizon Virginia	NRFLVABL	Norfolk- Brickel Rd
Verizon Virginia	NRFLVABS	Norfolk- Bute St
Verizon Virginia	NRFLVAGS	Norfolk- Granby St
Verizon Virginia	NRFLVAOV	Norfolk- Ocean View
Verizon Virginia	NRFLVASP	Norfolk- Sewells Pt
Verizon Virginia	NRFLVAWC	Norfolk- W Little Creek Rd
Verizon Virginia	NRWSVANA	Narrows
Verizon Virginia	NWNWVAHU	Newport News- Huntington Av
Verizon Virginia	NWNWVAHV	Newport News- Harpersville Rd
Verizon Virginia	NWNWVAJF	Newport News- Jefferson Av
Verizon Virginia	NWNWVAND	Newport News- Nettles Dr
Verizon Virginia	NWNWVAYK	Newport News- Yorktown Rd

Verizon Virginia	PNRVVAPR	Piney River
Verizon Virginia	PTBGVACD	Petersburg- Chesdin
Verizon Virginia	PTBGVAPB	Petersburg
Verizon Virginia	PTMOVAHF	Portsmouth- Hodges Ferry
Verizon Virginia	PTMOVAHS	Portsmouth- High St
Verizon Virginia	PWHTVAPW	Powhatan
Verizon Virginia	RCMDVACG	Richmond- Cogbill
Verizon Virginia	RCMDVAGK	Richmond- Gaskins Rd
Verizon Virginia	RCMDVAGR	Richmond- Grace St
Verizon Virginia	RCMDVAGY	Richmond- Gayton Rd
Verizon Virginia	RCMDVAHL	Richmond- Hull St
Verizon Virginia	RCMDVAHR	Richmond- Hermitage
Verizon Virginia	RCMDVAHS	Richmond- Hungary Spring Rd
Verizon Virginia	RCMDVAIT	Richmond- Turner Rd
Verizon Virginia	RCMDVALS	Richmond- Logan St
Verizon Virginia	RCMDVAPE	Richmond- Pemberton
Verizon Virginia	RCMDVAPS	Richmond- Patterson
Verizon Virginia	RCMDVARA	Richmond- Randall Av
Verizon Virginia	RCMDVASN	Richmond- Second Av
Verizon Virginia	RCMDVASR	Richmond- Stuart Av
Verizon Virginia	RCMDVATC	Richmond- The Crossings
Verizon Virginia	RDFRVARA	Radford
Verizon Virginia	RONKVABK	Roanoke- Barkley
Verizon Virginia	RONKVABS	Roanoke- Bonsack
Verizon Virginia	RONKVACS	Roanoke- Cave Spring
Verizon Virginia	RONKVACV	Roanoke- Cove Rd
Verizon Virginia	RONKVAGC	Roanoke- Garden City
Verizon Virginia	RONKVALK	Roanoke- Luck Av
Verizon Virginia	SALMVAFL	Salem- Fort Lewis
Verizon Virginia	SALMVAMC	Salem- Mason's Cove
Verizon Virginia	SALMVASA	Salem
Verizon Virginia	SFFLVASK	Suffolk
Verizon Virginia	SNMTVASM	Stone Mountain
Verizon Virginia	SNTNVASS	Sandston
Verizon Virginia	STCYVASC	Stephens City
Verizon Virginia	STDRVASD	Stuarts Draft
Verizon Virginia	STTNVAST	Staunton
Verizon Virginia	STTNVAVE	Staunton- Verona
Verizon Virginia	SWVLVA	Stewartsville
Verizon Virginia	TOANVATO	Toano
Verizon Virginia	VARNVAVR	Varina
Verizon Virginia	VRBHVACC	Virginia Beach- Chinese Corner
Verizon Virginia	VRBHVACT	Virginia Beach- Centerville Tpk

Verizon Virginia	VRBHVAGN	Virginia Beach- Great Neck Rd
Verizon Virginia	VRBHVAIL	Virginia Beach- Indian Lakes
Verizon Virginia	VRBHVAIR	Virginia Beach- Indian River Rd
Verizon Virginia	VRBHVAPT	Virginia Beach- Plaza Trail
Verizon Virginia	VRBHVARC	Virginia Beach- Robbins Corner
Verizon Virginia	VRBHVASR	Virginia Beach- Salem Rd
Verizon Virginia	VRBHVAVB	Virginia Beach- 32nd St
Verizon Virginia	WLBGVAWM	Williamsburg
Verizon Virginia	WNCHVANM	Winchester- North Mountain
Verizon Virginia	WNCHVAWC	Winchester
Verizon Virginia	WNTRVAWG	Wintergreen
Verizon Virginia	WVRLVAWV	Waverly